

PUBLIC SUBMISSION

As of: May 29, 2009 Tracking No. 809bda19 Comments Due: May 28, 2009

Docket: [IRS-2009-0008](#)

Request for Information for Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

Comment On: [IRS-2009-0008-0001](#)

Request for Information Regarding the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

Document: [IRS-2009-0008-0117](#)

Comment on FR Doc # E9-09629

Submitter Information

Name: Robert Michael Woznicki

Address:

port Jefferson, NY,

Organization: Robert M. Woznicki M.D. PC

General Comment

RE: Docket ID IRS-2009-0008 Docket Title Request for Information for Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008 Document ID IRS-2009-0008-0001 Document Title Request for Information Regarding the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

Dear Sirs:

I'm writing as a board certified psychiatrist with over 20 years of experience working with all age groups, including the developmentally disabled. There will be innumerable other letters addressing the issues of discrimination in psychiatric treatment. I'm writing to address a particular area. The realm of biofeedback and EEG-biofeedback has suffered its own prejudice, even from mental health practitioners, insurers and policy-makers.

Biofeedback has been an effective clinical tool for decades, and with recent improvements in technology has become a treatment choice in some clinical circumstances where pharmacologic interventions are too global and surgical interventions too invasive. The Department of Defense has recently established EEG biofeedback clinics for the treatment of traumatic brain injured veterans. Cardiology journals have noted the primal importance of heart rate variability in longevity.

The persistent efforts of mathematicians, engineers, scientists and clinicians in facilities as sophisticated as the National Institutes of Health and as

plebian as poorly funded Special Education departments of local school districts have developed diagnostic and clinical tools useful in the treatment of a variety of mental disorders. The neuroscience supporting EEG-biofeedback is robust, clinical findings are compelling. The potential drawbacks are few compared to most medical interventions, as the procedure is noninvasive. EEG biofeedback falls outside the remaining medical paradigms of pharmacologic and surgical interventions and has therefore been given short shrift. It is a powerful tool, too seldom used. In states where its coverage by medical insurance is mandated, benefit has become evident. A serious look at the effectiveness of EEG biofeedback would result in its inclusion among mandated treatments.

Robert M. Woznicki M.D.
640 Belle Terre Rd, Bldg J
Port Jefferson, NY 11777